



Public Service Commission of Wisconsin

Phil Montgomery, Chairperson
Eric Callisto, Commissioner
Ellen Nowak, Commissioner

610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

September 2, 2011

Via Electronic Comment Filing System

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Universal Service Lifeline/Linkup Reform and Modernization Proceeding
WC Docket Nos. 09-197, 11-42, 03-109 & CC Docket No. 96-45, DA Docket
No. 11-1346**

Notice of Ex Parte Presentation

Dear Ms. Dortch:

This is a follow-up communication to further describe the conversation, on August 8, 2011, between Wisconsin Universal Service Manager, Chela B. O'Connor and Jonathan Lechter of the Wireline Competition Bureau about the current system used by the state of Wisconsin for customer verification.

Lifeline/LinkUp eligibility verification in Wisconsin is governed by Public Service Commission of Wisconsin (PSCW) rules. The rules require local exchange service providers to work with state agencies to query databases that track a customer's eligibility for programs that qualify them for LifelineLinkUp. (Wis. Admin Code PSC ch. § 160.06) The current programs that meet the Lifeline/LinkUp eligibility criteria are served through 2 different state databases. The "homestead credit" eligibility is verified through the Wisconsin Department of Revenue. All other qualifying programs are verified through a single database with the Wisconsin Department of Health Services (CARES). Eligibility must be reconfirmed by query on an annual

basis. The customer is only contacted to sign the consent to query the databases.

Lifeline/LinkUp local exchange service providers contact the respective agencies and enter into agreements to query the database with the customers permission to determine eligibility. In the past the PSCW relationship with the providers and the verifying agencies has been indirect.

Currently the PSCW is working with state agencies responsible for the databases to monitor and audit the verifications done to ensure compliance with the rules. In addition, Wisconsin is preparing to establish a process for monitoring and notification of potential duplications in the program. New auditing capabilities will allow the PSCW to determine whether a single customer has been queried for verification and allow the carriers to resolve who will serve the customer to avoid duplicate service to a single customer. The PSCW finds duplicate service is a greater possibility in the current wireless market due to the mobile nature of the service. In the landline arena, a service address was the primary verification of the existence of service.

Pursuant to § 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please contact the undersigned with questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chela B. O'Connor', with a stylized, cursive script.

Chela B. O'Connor
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